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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Mar 06, 2024

SEAN F. McAVOY, CLERK

10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

Case No.: 2:24-CR-32-SAB-1

13 Plaintiff,

INDICTMENT

14 v.

Vios: 18 U.S.C. § 1951(a)
Robbery Affecting Commerce
(Count 1)

15 BRYON WOKAL,

16 Defendant.

18 U.S.C. § 924(c)(1)(A)(ii)
Brandishing a Firearm During
a Crime of Violence
(Count 2)

18 U.S.C. 981(a)(1)(C), 18
U.S.C. § 924(d)(1); 28 U.S.C.
§ 2461
Forfeiture Allegations

23 The Grand Jury charges:

24 COUNT 1

25 On or about January 2, 2024, in the Eastern District of Washington, the
26 Defendant, BRYON WOKAL, did unlawfully obstruct, delay, and affect
27 commerce, and the movement of articles and commodities in such commerce, by
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INDICTMENT – 1

1 robbery, to wit: the Defendant did unlawfully take and obtain personal property, to
2 wit: U.S. Currency belonging to the Kalispel Market, from C.S., an employee of
3 the Kalispel Market, in C.S.'s presence and against C.S.'s will, by means of actual
4 and threatened force, violence, and fear of injury, immediate and future, to C.S.'s
5 person, all in violation of 18 U.S.C. § 1951(a).

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COUNT 2

On or about January 2, 2024, in the Eastern District of Washington, the
Defendant, BRYON WOKAL, did knowingly use, carry, and brandish a firearm
during and in relation to a crime of violence for which the Defendant may be
prosecuted in a court of the United States, namely, Robbery Affecting Commerce,
as charged in Count 1 of this Indictment, in violation of 18 U.S.C.
§ 924(c)(1)(A)(ii).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations set forth in this Indictment are hereby realleged and
incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon
conviction of a violation of 18 U.S.C. § 1951(a), as set forth in Count 1 of this
Indictment, the Defendant, BRYON WOKAL, shall forfeit to the United States of
America, any property, real or personal, which constitutes or is derived from
proceeds traceable to the offense.

If any of the property described above, as a result of any act or omission of
the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

1 e. has been commingled with other property which cannot be divided
2 without difficulty,
3 the United States of America shall be entitled to forfeiture of substitute property
4 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

5 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
6 of an offense in violation of 18 U.S.C. § 924(c)(1)(A)(ii), as set forth in Count 2,
7 the Defendant, BRYON WOKAL, shall forfeit to the United States of America any
8 firearm or ammunition involved or used in the commission of the offense.
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10 DATED this 5th day of March, 2024.
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12 A TRUE BILL
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